



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 18, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)

Dear Judge Nathan:

The Government respectfully submits its motions *in limine*, which the Government is submitting to the Court under seal by email with proposed redactions. The Government's proposed redactions are consistent with the three-part test articulated by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Although the Government's motions *in limine* are judicial documents subject to the common law presumption of access, the proposed redactions are narrowly tailored to protect the privacy interests of victims—including victims who have not identified themselves on the record in this case and who have not publicly identified themselves as victims referenced in the Indictment in this case—and third parties referenced in the document.

In addition, the Government seeks redaction of Section X at least until the conclusion of trial. Additional justification for this sealing request is located in footnote 11 on page 49 of the Government's motions *in limine*.

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Accordingly, the Government respectfully requests that the Court permit the Government to publicly file its motions *in limine* with its proposed redactions.

Respectfully submitted,

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Cc: Defense counsel (By ECF)